

Message

---

**From:** Smith, Julie [Smith.Julie@epa.gov]  
**Sent:** 10/4/2022 12:40:35 PM  
**To:** Horn, Chris (FHWA) [Chris.Horn@dot.gov]; Razzazian, Christopher [Razzazian.Christopher@epa.gov]; Lohrke, Gregory [lohrke.gregory@epa.gov]; Margason, Laura [Margason.Laura@epa.gov]  
**CC:** Gibson, Stephanie (FHWA) [Stephanie.Gibson@dot.gov]; Basil Ryer [basil.ryer@state.co.us]; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com) [carrie.wallis@atkinsglobal.com]  
**Subject:** RE: I-70 East ROD2/NEPA Air Quality Analysis Draft Work Plan\_EPA Region 8 Comments\_9\_29\_22

Thank you for your feedback, Chris. Julie

---

**From:** Horn, Chris (FHWA) <Chris.Horn@dot.gov>  
**Sent:** Monday, October 3, 2022 2:41 PM  
**To:** Smith, Julie <Smith.Julie@epa.gov>; Razzazian, Christopher <Razzazian.Christopher@epa.gov>; Lohrke, Gregory <lohrke.gregory@epa.gov>; Margason, Laura <Margason.Laura@epa.gov>  
**Cc:** Gibson, Stephanie (FHWA) <Stephanie.Gibson@dot.gov>; Basil Ryer <basil.ryer@state.co.us>; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com) <carrie.wallis@atkinsglobal.com>  
**Subject:** RE: I-70 East ROD2/NEPA Air Quality Analysis Draft Work Plan\_EPA Region 8 Comments\_9\_29\_22

Julie and others,

Thank you for your comments. Below is a response to your request for clarification related to the traffic data used for the air quality modeling for the I-70 ROD2 Direct Connection and the I-270 projects.

Both projects are included in the approved DRCOG Fiscally Constrained Regional Transportation Plan (RTP) and coded in DRCOG's approved Focus Transportation Demand Models (TDM) used as the bases for the traffic data for these projects – within the DRCOG MPO boundary, to maintain compliance with 40 CFR 93, we use the approved TDM as the basis of the traffic analysis. Thus, the analysis of both projects include the presence and effect on traffic of the other project as well as other planned projects in the area. Both the "build and no-build scenarios" use the MPO's TDM's and have the same base line projects included (270, Direct Connects, and others). The only difference is the no-build scenario has the specific project being analyzed removed; it includes and assumes all other projects in the RTP will be built within the plans horizon.

At this time we are evaluating if a specific reference to the I-270 project should be included in the work plan as requested. We feel it is addressed in Section 2 of the work plan where reference is made to the use of DRCOG's TDM Focus version 2.3.1 for traffic data. This version of the TDM includes the improvements of I-270 as well as other projects in the area that have an effect on the traffic used in the project's air analysis. Specifically referencing I-270 as requested could lead other readers to interpret it as other planned projects, such as Pena Boulevard, have been excluded from the TDM data used on this project.

Chris Horn, PE  
Senior Area Engineer  
FHWA – Colorado Division  
12300 W. Dakota Ave Suite 180  
Lakewood, CO 80228  
720-963-3017

---

**From:** Smith, Julie <Smith.Julie@epa.gov>  
**Sent:** Thursday, September 29, 2022 4:16 PM  
**To:** Horn, Chris (FHWA) <Chris.Horn@dot.gov>; Razzazian, Christopher <Razzazian.Christopher@epa.gov>; Lohrke,

Gregory <[lohrke.gregory@epa.gov](mailto:lohrke.gregory@epa.gov)>; Margason, Laura <[Margason.Laura@epa.gov](mailto:Margason.Laura@epa.gov)>

Cc: Gibson, Stephanie (FHWA) <[Stephanie.Gibson@dot.gov](mailto:Stephanie.Gibson@dot.gov)>; Basil Ryer <[basil.ryer@state.co.us](mailto:basil.ryer@state.co.us)>; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com) <[carrie.wallis@atkinsglobal.com](mailto:carrie.wallis@atkinsglobal.com)>

**Subject:** RE: I-70 East ROD2/NEPA Air Quality Analysis Draft Work Plan\_EPA Region 8 Comments\_9\_29\_22

**Importance:** High

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon, Chris.

Thank you for providing us with the opportunity to review the I-70 East ROD 2 Air Quality Analysis Draft Workplan. The subject Workplan is specific to emissions that will occur because of construction of the direct-connect ramps between I-70 and I-270. As the main I-270 improvements are concurrently being assessed by CDOT/FHWA for environmental and public health impacts, we would request the final Workplan clarify whether emissions modeling for this analysis will incorporate traffic data effects of the action and no-action scenarios in the main I-270 proposal.

Additionally, we request clarification on whether the main I-270 project's analysis reflects traffic effects of the connector project's build and no-build scenarios for that project's future analysis year. EPA notes that the DRCOG 2022-2025 TIP envisions the scope of the environmental assessment for I-270 corridor improvements to include any connections to I-70 and I-25. See 2022-2025 TIP Project Description for TIP-ID: 2020-068. Overall, EPA recommends that the build-scenario air quality analysis reflects consideration of the alternatives for the ongoing I-270 improvement project. Likewise, we recommend that the I-270 improvement project include considerations for the alternatives presented for the direct connect lanes.

Thanks again for sharing the subject Workplan. We look forward to discussing our comments above should you have questions or points for clarification.

Best regards – Julie

*Julie Ann Smith, PhD*  
Physical Scientist  
U.S. EPA Region 8 (ORA-N)  
1595 Wynkoop Street  
Denver, CO 80202  
303-312-6736

---

**From:** Horn, Chris (FHWA) <[Chris.Horn@dot.gov](mailto:Chris.Horn@dot.gov)>

**Sent:** Wednesday, September 28, 2022 9:48 AM

**To:** Smith, Julie <[Smith.Julie@epa.gov](mailto:Smith.Julie@epa.gov)>; Razzazian, Christopher <[Razzazian.Christopher@epa.gov](mailto:Razzazian.Christopher@epa.gov)>; Lohrke, Gregory <[lohrke.gregory@epa.gov](mailto:lohrke.gregory@epa.gov)>; Margason, Laura <[Margason.Laura@epa.gov](mailto:Margason.Laura@epa.gov)>

**Cc:** Gibson, Stephanie (FHWA) <[Stephanie.Gibson@dot.gov](mailto:Stephanie.Gibson@dot.gov)>; Basil Ryer <[basil.ryer@state.co.us](mailto:basil.ryer@state.co.us)>; Wallis, Carrie (Carrie.Wallis@atkinsglobal.com) <[carrie.wallis@atkinsglobal.com](mailto:carrie.wallis@atkinsglobal.com)>

**Subject:** RE: Please Review: I-70 East ROD2/NEPA Air Quality Analysis Draft Work Plan

Julie,

This email is a follow-up and reminder that any comments EPA might have on the draft Work Plan for Air quality for the I-70 East ROD2 Direct Connection project are due on Friday Sept 30<sup>th</sup>. We have completed our review and had very few minor comments (nothing substantive); we look forward to seeing any comments EPA might have on the document.

Chris Horn, PE  
Senior Area Engineer  
FHWA – Colorado Division  
12300 W. Dakota Ave Suite 180  
Lakewood, CO 80228  
720-963-3017

---

**From:** Horn, Chris (FHWA)  
**Sent:** Thursday, September 15, 2022 7:04 AM  
**To:** Julie Smith ([smith.julie@epa.gov](mailto:smith.julie@epa.gov)) <[smith.julie@epa.gov](mailto:smith.julie@epa.gov)>; Razzazian, Christopher <[Razzazian.Christopher@epa.gov](mailto:Razzazian.Christopher@epa.gov)>; [lohrke.gregory@epa.gov](mailto:lohrke.gregory@epa.gov); [margason.laura@epa.gov](mailto:margason.laura@epa.gov)  
**Cc:** Gibson, Stephanie (FHWA) <[Stephanie.Gibson@dot.gov](mailto:Stephanie.Gibson@dot.gov)>; Basil Ryer <[basil.ryer@state.co.us](mailto:basil.ryer@state.co.us)>; Wallis, Carrie ([Carrie.Wallis@atkinsglobal.com](mailto:Carrie.Wallis@atkinsglobal.com)) <[carrie.wallis@atkinsglobal.com](mailto:carrie.wallis@atkinsglobal.com)>  
**Subject:** Please Review: I-70 East ROD2/NEPA Air Quality Analysis Draft Work Plan

Julie and others

In line with our meeting on 7-28-2022 and my follow-up email on 8-3-2022 please find attached the draft Work Plan for Air quality for the I-70 East ROD2 Direct connection project.

You are receiving this as a concurrent review with FHWA (we have not reviewed it yet) and we have been asked to provide comments no later than September 30<sup>th</sup>, 2022 – thus please provide any comments you might have to me by that date.

Thanks in advance

Chris Horn, PE  
Senior Area Engineer  
FHWA – Colorado Division  
12300 W. Dakota Ave Suite 180  
Lakewood, CO 80228  
720-963-3017